**Before
the
Federal Communications
Commission
Washington, D.C.
20554**
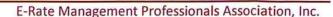
In the Matter of	)	
	)	
Modernizing the E-rate	)	WC Docket No. 13-184
Program for Schools and Libraries	)	
	)	

Reply Comments of the E-Rate Management Professionals Association, Inc. (E-mpa™) in Response to E-Rate 2.0 NPRM

The E-Rate Management Professionals Association, Inc. (E-mpa™) is a (501) (c) (6) trade association whose purpose is to promote excellence and ethics in E-rate professional management and consulting through certification, education and professional resources.

E-mpa™ serves as an advocate for the critical role served by E-rate management professionals and consultants and their constituents. The organization strives to strengthen and support the E-rate program by acting as a self-governing body of E-rate management professionals and consultants. E-mpa™ provides assurance to stakeholders by maintaining the highest standards, developing and promoting best practices, and requiring ethical conduct for all members.

The members of our association provide E-Rate Program consultation and management services to E-Rate program participants. Our combined client list represents schools and libraries ranging from the small rural remote school district to very large urban school districts, individual libraries to large library systems. Of the $4.10 Billion Dollars applied for in funding Year 2013, E-mpa™ member's Applicants applied for $1.83 Billion Dollars (37% of all E-rate funding). Therefore, we have an excellent perspective of the current and future technology and telecommunications needs of our clients throughout the United States and territories and the amount of money needed to fund these systems. We have access to the most recent and competitive marketplace pricing for E-Rate eligible services due to our review of our applicants' competitive bidding processes. This knowledge positions our group to provide real time insight into the current, and more importantly, future broadband needs

of our clients. Since we also physically file USAC forms, we have an in depth knowledge of what it takes to prepare the forms and the issues and problems that arise when the FCC and USAC make changes to the program and the forms themselves.

E-mpa™ has reviewed the replies made by many of the major stakeholders that responded to the recent FCC NPRM regarding the future of the E-rate program and we have commented below on areas where we support or take issue with their comments. We are only responding to those issues where we have a consensus of opinion by the majority of our E-mpa™ member firms and making comments on those areas that support our original NPRM response dated September 16, 2013.

At the end of our response, we have also provided some comments about the value we bring to the Applicants we serve and to the E-Rate program in general. We have also made some brief comments at the end of our response restating some basic concepts we support from the original NPRM.

State's Department of Education Comments:

State comments are italicized and copied from their original submissions to the NPRM.

Alabama:

E-mpa™ supports:

The FCC should focus on the current needs of the schools and libraries as determined by the schools and libraries in regards to the E-rate program funding. The FCC should seek the collaboration of their own and other funding programs for similar services as well as various State Agencies and corporate interests when possible to prevent duplication of services.

The FCC should modify the current ESL to favor HSB services and equipment. This may include placing some traditional Priority 2 services for LAN related equipment into a higher level of priority, therefore, the FCC should consider modifying the Priority of services and equipment.

Additional E-mpa™ Comment: Eliminating the Priority system altogether would be another way of eliminating this problem.

Alaska (EED):

E-mpa™ supports:

E-mpa™ supports and acknowledges the challenges some states face with connectivity. Our struggle as a state is that, while students have access to the Internet at school, many do not
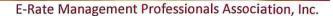
have access at home. We appreciate the Community Use Order of 2010, made permanent in the Sixth Report and Order, as it allows bandwidth usage beyond the school day for communities and is a real step in allowing for access where previously there was little or none. Providing the bandwidth that our students need to utilize their 1-to-1 devices continues to be a challenge within our state's vast rural regions.

We encourage the Commission to revise its data collection mechanism, whether it is included in the body of the Form 471, its Item 21 attachment, or within an applicant portal so that meaningful data can be collected and accessed by applicants, agencies, and industry. More accurate and quantifiable information on connection speeds, connection types, numbers of connections, population served, number of sites, and community use/"school spot" utilization would be welcome and encouraged.

EED believes that schools and libraries should be given the flexibility to select the best technology that fits their particular needs. Fiber is not an option for many locations in Alaska due to weather and geography. Where fiber is not available microwave connectivity becomes the terrestrial alternative for servicing communities of 300 or fewer people. But microwave connectivity is not available throughout many regions of Alaska, making satellite connectivity the only option. Prioritizing fiber connectivity would penalize locations where fiber is not an affordable or available option.

EED believes that school and library staffs are vital to the existence of our schools and libraries and that much of the work done that is necessary to educate and provide access to our students and patrons occurs by trained professionals that are laying the foundation for learning and access. E-rate funds should continue to be eligible for all staff employed by schools and libraries. We do not believe that because services are not directly available to students or patrons that they are not being conducted on behalf of education and library service. Non-instructional centers (NIFs) exist because they support schools and libraries in a very fundamental way. The current practice of allowing NIFs to be assigned the average of the entire district has proven to be a successful way of determining funding and we recommend that the existing method not be changed. Cost allocation is a burdensome process for applicants and requiring that administrative use of services be cost allocated would be counterproductive to the FCC's proposed goal of streamlining the administration of the E-rate program.

EED does not support document retention requirements such as are necessary in the High Cost Fund. Our applicants have the requirement of retaining documentation a minimum of 5 years from the last date to receive service, which in most cases is 7 years and in some is considerably longer. We have not encountered a situation where the current document retention

requirements were not sufficient.

EED believes that requiring the applicant to submit competitive bidding documentation, including a copy of each bid received and verification of every step in the bidding process, would pose an unnecessary burden on both the applicant and the review process. Currently applicants must supply, when asked, any competitive bidding documents that a reviewer needs to see. For our school districts perhaps 1 in 10 will need to produce one of the many competitive documents associated with their funding request. For libraries this number drops significantly. We do not believe that there is a problem with the procedure as it stands and that this change would be counterproductive to the Commission's proposed goal of streamlining the administrative process for E-rate applications.

ARKANSAS:

E-mpa™ supports:

Arkansas supports the ConnectEd imitative and believes that high speed broadband is imperative in today's education environment. We believe that dark and lit fiber should be treated the same. We believe that equipment necessary to support the high speed broadband connections should be moved to Priority One funding. Arkansas also believes that applicants must have the option to purchase rather than to lease connectivity, including a Wide Area Network (WAN) where feasible. We agree with allowing amortization of capital costs but point out the decision must made by the applicant.

Arkansas does not support the elimination of or phasing down of support for any currently eligible service. We also do not support the elimination of funding for administrative functions associated with schools and libraries.

Arkansas strongly discourages tying educational impact with E-rate funding as there are other factors that also impact education. Measuring educational impact was never a goal of the program.

Arkansas supports collection of data through a revised FCC Form 471 that incorporates the Item 21 Attachment as part of the application. We do not support a requirement that would force applicants to enter more granular data into an application or other database. This additional burden is counter to the goal of streamlining the application process. We also support SECA's proposed web portal for all E-rate documentation.

It is imperative that the E-rate process be simplified. To accomplish this goal Arkansas recommends:

- *The creation of an all-inclusive site to house rules, policy and procedures that is searchable and easy to navigate*
- *Electronic submission of applicant data that is mapped to the SLD's data*
- *Set a permanent filing window*
- *Incorporate the Item 21 Attachment into the FCC Form 471 as Block 5b and allow applicants to upload information*
- *Routine applications that do not change from year to year should be reviewed only when there is a fluctuation in cost or E-rate discount*
- *Remove the necessity for cost allocation*
- *Simplify the Eligible Services List*
- *Arkansas strongly supports multi-year contracts and multi-year applications. We do not support the proposal that multi-year contracts are limited to three years.*

Illinois:

E-mpa™ does not support funding requests/decisions moving from local to state control:

We believe one time capital funds and ongoing funds should be focused on laying the foundation for excellence in our schools and libraries, this means focusing on external and internal high speed broadband connections, and phasing out E-rate funding for application legacy services. We believe high speed connections will provide the most leverage to schools and libraries allowing them and third parties to develop yet to be invented applications and new modes of teaching.

We believe funding requests for one time capital funds or ongoing E-rate funds should be by public school districts or groups of public school districts. Both for construction and lit service request,. ie. the smallest size requesting entity should be the public school district, not an individual public school. We believe this approach will provide administrative efficiencies to schools and increase the participation rate. Concerning public libraries, we believe funding requests by library district should provide administrative efficiencies versus requests by individual libraries.

The management of one time capital funds should be at the state level. For example, the state should prioritize the school districts requiring construction funds. The state would be responsible for issuing the Request for Proposals (RFPs) and evaluating responses. State level management will help schools and libraries that lack resources and will provide administrative efficiencies while still having competitive bidding at the school district or school district group

level. Detailed information on this process is given in Section 5.

If one time capital funds are supporting a build there should be a number of strands, for example, a minimum of four, owned by the school district via an indefinite term Indefeasible

Hawaii:

E-mpa™ supports:

Hawaii supports the Commission's proposals to increase program efficiency by facilitating long-term cost savings by permitting the construction of Wide Area Networks and the gradual phasing down of support for legacy services. The Commission's attention to the use of E-rate services for educational purposes and how to determine the reasonable needs of a given applicant are also commendable, but on these latter two proposals Hawaii is concerned that overly invasive regulation may have the effect of reducing efficiency rather than promoting it, while also reducing the value of the program by creating constraints and uncertainty for applicants.

Hawaii strongly supports the Commission's recognition that the ultimate effectiveness of the E-rate program as a whole depends in part on how efficiently it can be administered, and that administrative burdens on applicants and the Commission can significantly undermine the benefits of the program. Hawaii is required to submit more than 500 forms per year as part of its E-rate application and compliance process. This administrative overhead draws personnel hours and funding away from the core goal of implementing technology programs to further education.

Any streamlining of forms, deadlines, and requirements would be welcome. For one such change, Hawaii recommends that technology plans only be required, for example, every two to three years for schools with no change in their eligibility level over that period of time. The Commission could instead seek a certified statement from a school administrator that the school remains in substantially the same position as the previous year. Allowing multi-year contracts would be another possible way to reduce paperwork.

Iowa:

E-mpa™ supports:

Summary of Iowa's comments

1. The E-rate program has offered significant benefits to districts and schools. However, the program focus needs to ensure priority funding for broadband connectivity to and within

schools. Dark fiber and lit fiber should be eligible in a consistent manner, and the purchase and ownership of WANs by applicants should be E-rate eligible in cases where cost effectiveness can be demonstrated.

2. The current E-rate cap is not adequate to meet the demand for broadband connectivity to and within schools and must be adjusted upward to meet the demand.

3. The E-rate program needs to continue to rely upon applicant demand for services rather than resort to a per student allocation.

4. Streamlining the application and review process will ensure funding commitments are made more quickly. Relying upon state and local procurement regulations, expediting the review of multi-year contracts and utilizing district-level calculations will enhance the application and review process.

5. The Commission should adopt emergency relief processes based upon the Katrina Order.

Kentucky:

E-mpa™ supports:

Decisions regarding which technological architectures best meet the needs for schools to deliver broadband to the classroom (both to and within buildings) should be a local decision. Because usage and the need for different levels and types of service are widely diverse, it is important that local officials have the flexibility to select the technologies that will most directly meet their needs.

Eligible services should be focused on support for school connectivity services and the essential equipment necessary to provide Internet connectivity to the classroom level and all instructional and learning areas associated with the school. This would include data circuits, WAN connections, LAN connections, routers, switches, wireless access points and other critical networking components. These services should be Priority 1 services.

Extending the document retention schedule for E-rate participation beyond five years is not reasonable.

Massachusetts:

E-mpa™ supports:

The FCC Should Ease the Administrative Burden on Schools and Libraries.

The FCC's goal to streamline the administrative burden on schools and libraries is admirable, and the MDTC urges the FCC to make this its primary focus. Under the current system, not only do applicants complete at least six FCC forms over a funding year, they must also face to the potential of having to respond to numerous additional requests for information and documentation requests from USAC.   The FCC indicates that delays in USAC's application review process forces applicants to make purchasing decisions while their applications are pending and before they know whether they will receive funding. Further, applicants may erroneously classify their requests by virtue of "be[ing] unfamiliar with the regulatory framework for telecommunications services and Internet access[.]"

The MDTC endorses eliminating the "priority" funding and eligible services distinctions. The MDTC agrees that adoption of a "whole-network" approach would provide greater flexibility to schools and libraries in their selection of services. In addition, use of a single, "consolidated menu of services" through the Eligible Services List, rather than the "priority" levels of service associated with regulatory classifications understood by a select few, better reflects and adapts to market realities as they relate to services provisioned to consumers, generally. Adoption of this approach would not only ease the burden borne by schools and libraries; it would also likely help to alleviate USAC's administrative burden in its review process and provide greater certainty for an applicant's funding prospects.
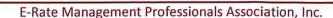
West Virginia:

E-mpa™ supports:

The current the Form 500 is a labor-intensive form if utilizing for multiple funding requests. Moving this functionality online would not only alleviate the issue of limited data entry per page, but it could also create less work for applicants.

Currently, the WVDE, along with any district utilizing consultant services or for whom the applicant is not the signatory, is forced to file the Form 472 on paper format. This is due to the requirement that you must be the PIN holder in order to start and certify an online Form 472 Billed Entity Applicant Reimbursement (BEAR) Form. In West Virginia, at the state level the only authorized agent to sign forms is the State Superintendent of Schools. However, the superintendent has neither the time nor expertise to complete functions that should be assigned to those in his employ. As a result, it would not only be unethical, but illegal for the State E-rate Coordinator to initiate and consummate the BEAR forms as it stands now.

The State E-rate Coordinators' Alliance (SECA) has frequently asked for modifications to this form so that it mirrors other online forms that require the signatory's certification to complete, but not to initiate. The WVDE would immediately cease paper BEAR forms if this were to be

initiated in order to not only take advantages of system checks available, but also to expedite processing and reimbursements. We would assume this is the major reason, aside from service providers not participating in the online BEAR, for applicants not to choose this methodology.

We request that the FCC not prohibit contracts exceeding three years where state laws allow, or emergency extensions are necessitated. For even a state agency with telecommunications and technology expertise, RFP processes are a monumental task.

Those with multiple contract types are constantly burdened with these processes and reducing the amount of time the contract can remain in place would aggrieve school districts that count on state master contracts as a route to simplify the E-rate process.

Within the large volume of comments that have been submitted on the E-rate NPRM, E-mpa™ has taken a look at the comments from a variety of states and provides the following reply comments.

Overall, there are many statements made by various state agencies that E-mpa™ agreed with. Almost to a submission, the states argued that the level of funding within the program was inadequate to meet the needs of Advanced Broadband services, and that a substantial, permanent increase in the size of the E-rate fund should be made. E-mpa™ wholeheartedly supports any effort to expand the size of the fund and to streamline the application review process to make better use of existing funds.

Likewise, E-mpa™ agrees with comments made by the state of South Dakota regarding the need to trim obsolete technologies or technologies where much abuse has changed the intent of the program from the Eligible Services List. Under the new Eligible Services List: webhosting, paging directory assistance, and basic maintenance of internal connections (BMIC) should be eliminated from the list. We agree with their position that aircards (and cellphone data plans?) are a very costly means of providing wireless access to the classrooms, combined with high administrative burden of cost allocating eligible from ineligible use, should exclude them from the Eligible Services List in favor of more cost-effective options.

While we are in agreement that Voice should be continue to be funded for now, we agree with SECA (State E-Rate Coordinators Alliance) that stand alone voice lines should be subsumed into the larger data lines as most connections are now digital over VoIP. Separate voice funding requests do not meet the bright line test of broadband to the pole and wireless to the classroom espoused by the Connect ED proposal—whereas voice within the digital framework would continue to be funded. A close analogy is that funding for E-rate requires applicants to filter content, but not pay for it. A school can still (and should) have an analog phone line back up in case the power goes out or the digital network goes down, but that
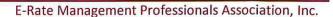
doesn't mean that E-rate should continue to pay for it. As we try to stretch scarce E-rate resources, eliminating funding for analog voice over a period of 5 years gives applicants plenty of time to transition to a digital infrastructure capable of supporting the high speed bandwidth that is the goal of E-rate 2.0.

We also agree with states including Utah and Iowa that USAC should move to a multi-year funding cycle as is currently being done by the Rural Health Care division of USAC—particularly for large statewide consortium applications. The current process is very labor intensive requiring the validation of data at the state level each year, when the underlying multi-year contract does not change. Better to have a multi-year review, with modifications of up to 5% annually for the contract valid for a minimum of 3 years, than to have USAC expend large time understanding each state's needs, and an increasing amount of manpower to process the applications. This change would save hundreds of hours – on both the applicant side and the administrator's side to administer these complex consortium applications.

E-mpa™ also supports the assertion made by the state of Arkansas that the program administration would be significantly streamlined if the application data were built into a web portal. Data could be entered throughout the year, and all correspondence would be kept in a single location, making it easy for both the applicant and reviewers to update content even when the 471 application filing window is not open.

E-mpa™ also agrees with a plurality of state comments that increasing the record retention requirements from 5 years to 10 years is unduly burdensome on the applicant. At a minimum, that would require applicants to hold records for at least 12 years, and in the case of multi-year contracts, that requirement would easily extend to 15 years or more. Because this is double the length of time that the IRS requires records to be retained, E-mpa™ joins the chorus of state respondents, applicants, service providers, and consultants loudly voicing opposition to the proposed rule change from 5 years to 10 years—with one exception: In the event that the applicant has a funding request appeal pending adjudication with the FCC, that they be required to keep all documentation relating to the pending appeal until the FCC rules on their request.

Finally, the FCC has sought comments on whether it should require the competitive bidding documentation to be submitted at the same time as the item 21. We agree with previous commenters, particularly the State of Alaska, that imposing such a requirement would become a de facto selective review on all applications. Currently we estimate that less than 5% of applications receive a selective review (About 2500 each year). By increasing that amount to 100%, it will increase the total number of selective reviews to 46,000—or a nearly

2000% increase in selective reviews—exponentially increasing costs for both for the applicant and for USAC, and cause many applications to be even further delayed than they have been in the past. If the average application with a selective review is delayed 6 months or more, we shudder to think how long it would take PIA to review 46,000 selective review applications. The purpose is to provide more efficient administration of the program—not more inefficient. Thus, E-mpa™ strongly agrees that absent a compelling reason to require the documentation such as a whistleblower allegation or bidding irregularity, etc., that full documentation should not be provided at the time of the Form 471 filing window.

Large Organizations:

For the most part, comments from SEDTA and EdLinc were high level statements supporting the Commission's desire to modernize the E-rate program versus the specific suggestions made by the E-MPA™ response. Below are the few specific comments that support E-MPA™'s view.

SEDTA

Paragraph 275 - Believes it is past due time for clarity regarding the applicability of CIPA to off-campus use of technology for teaching and learning (Principle 6 p.22)

Paragraph 163, 170 & 172 - Believes that to meet the goals and needs, a modernized E-rate program will need increased funding. (Principle 7 p.22)

Paragraph 239 - 242- Support multi-year contracts but don't add any details beyond this. (Principle 4 p. 20)

EdLinc

Paragraph 172 - 176 - E-rate's funding is inadequate to meet current and future demand and urges an increase to at least $5 Billion Annually. (III. p. 10)

Paragraphs 259 - 261 - Applicants should be allowed to choose direct reimbursement through the BEAR process. (VIII. p. 28)

Paragraph 239 - 242 - Support proposal to develop a multiyear application process to simplify multiyear contracts. (However, EdLinc believes in multiyear approval where E-MPA™ believes in filing a 471 each year and relieve burden of filing the Item 21 Attachment) (VIII p. 29)

CoSN (Survey data only)

In survey of 400 school districts, 92.5% of districts feel that E-rate at is current funding and

discount levels does not satisfy their current needs.

99% of districts report that they will need to increase their bandwidth in the next three years.

ESPA Comments:

"...consultants should be required to attend annual training and certification of some nature to ensure they are qualified to advise Applicants."

E-mpa™ Comment:

E-mpa™ has created a Certified E-Rate Management Professional (CEMP) certification, which requires years of experience, passage of a rigorous exam, and continuing education each year. We believe the certification gives participants confidence that they have a knowledgeable and experienced consultant, but certification should not be required. Just as taxpayers are not required to hire a CPA to manage their taxes, applicants should not be forced to hire a CEMP to manage the E-Rate process.

"Schools must have input from Service Providers who know their environment, and understand the technology in their environment, to protect them from making poor, and potentially expensive, decisions."

Lowest corresponding price rule is unnecessary: "LCP is a well-intended guideline but the lack of specifics behind its enforcement and the convoluted position of price being the primary factor in determining a solution, but not the only factor, leaves many confused."

"Adequate funding for Internal Connections resources and Basic Maintenance of these resources is necessary to ensure" bandwidth reaches students.
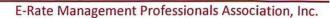
Service substitutions are routine for P2 and "could be better handled as part of the invoicing process or simplified in some other way"

"The approach of providing a certain dollar amount of funding per student will not be equitable for all sizes of schools."

"Investigation processes need to be much more open to avoid complexity and misinformation.'

"There must be more accountability in the Whistle blower process to avoid it being used as a competitive tool."

THE ROLE OF CONSULTANTS IN THE UNIVERSAL SERVICE PROGRAM—NOVEMBER 8, 2013 ADDENDUM TO THE MAY 20, 2009 SUBMITTAL TO THE FCC

E-mpa™

The following information related to "The Role of Consultants in the Universal Service Program for Schools and Libraries" (previously submitted to the Federal Communications on May 20, 2009, hereinafter called the "previous submission") is hereby submitted as an addendum to the original document by the E-mpa™ (E-rate Management Professionals Association, Inc. on this November 8, 2013.

Since the previous submission, certain significant events have occurred:

1)   The percentage of students eligible for NSLP has increased;

2)   The Community Eligibility Option was introduced by the Department of Agriculture but not recognized by the FCC or USAC creating an additional burden on schools and libraries;

3)   The availability of Priority 2 funding from USAC has decreased substantially;

4)   For the first time in its history, USAC has had to roll over prior year's funds in order to fully fund Priority 1 for funding year 2013-14;

5)   Schools and libraries are finding the need for E-rate funds even more important:

   a) The National Broadband Plan delineated bandwidth levels for schools;

   b) State level required on-line reporting of student test score achievement requires much additional bandwidth and computing resources;

   c) The ConnectEd Plan follows the National Broadband Plan with its recommended criteria for building-level bandwidth as well as high speed wireless connectivity to the internet for all students.

6) Without additional funding increased wired and/or wireless bandwidth for connecting with the outside world and staying globally competitive might be considered an unfunded mandate by both States' and the Federal Government.

7) The percentage of E-rate dollars requested by schools and libraries using E-rate consultants has increased from 54% ($2.54B of $4.67B in 2011) to 61% ($3.06B of $5.00B in 2013).

8) Compliance procedures from USAC have become more stringent requiring more information to be provided to Service Providers during USAC invoicing, more competitive bidding information details, and more details related to billed entity creation, mergers and closings.

9) Applications have become easier, application approvals slower, turn-around time for

service substitutions even longer, and the number of appeals increased.

10) E-mpa™ membership has increased.

E-mpa™ looks at these events and realizes its important role in the E-rate process. Whether consulting to schools, libraries or service providers, consultants can provide:

1)   A significant bridge between FCC/USAC and the full range of eligible services, operating procedures and required compliances for schools and libraries to successfully file for E-rate funding and navigate the E-rate program;

2)   A significant bridge between FCC/USAC and service providers related to eligible services, program compliances and vendor responsibilities required related to properly bid and respond to E-rate program applicants;

3)   An understanding of the competitive bidding requirements necessary to be in compliance with USAC/FCC rules;

4)   Appropriate analytical tools to ensure that applicants file for funding at fully eligible levels of NSLP discount;

5)   Support for invoicing whether in the form of Billed Entity Applicant Reimbursements or as Service Provider Invoices;

6)   Support for Appeals, Waivers, Service Substitutions, Extensions, Good Samaritans and other program tools often necessary in the course of program execution and perceived fairness.

 7) Continuity for applicants and/or service providers in many situations when turnover of E-rate contacts or organizational personnel often leave applicants and/or service providers with gaps in their knowledge of E-rate program policies, procedures, or compliances.

8) Provide an ongoing role of educating both service providers and applicants as to USAC and FCC requirements.

9) Encourage full utilization of the E-rate program, within eligibility and other guidelines.

 10) Provide program and procedural education and play the role of a translator as new rules of compliance and procedural methods evolve, are introduced, or change.

In summary, the need for bandwidth, internet access, network equipment, cables, drops, and wireless access has been increasing at an enhanced rate as educators and policy makers begin

to realize the full potential of technology in support of education and learning. Clients of E-rate consultants are often more informed than those applicants and vendors who do not have access to consultants or the resources to maintain close and ongoing contact with USAC newsletters, FCC orders and rulings, E-rate telephone conferences, or related seminars.

E-rate consultants play a most important role in ensuring that the program is fully utilized and that the rules related to compliance are followed. E-rate consultant clients are better informed enabling them to potentially make better technology choices and provide their organizations with a balanced approach to technology-based solutions and monetary support from the E-rate program.

E-rate consultants can act in multiple roles as well-educated eyes and ears for program administrators at the FCC, USAC, schools, libraries, and vendors. Program efficiency and effectiveness are forming the roots of successful E-rate consultants.

Additional Comments:

Increase the funding to the program to at least $5 billion dollars per year.

Allow Electronic filing of all forms and correspondence

Creating two different filing windows (one for P1, one for P2) is not a good idea

Competitive bid documents should not be submitted with the Form 471

Document Retention should not be changed from 5 to 10 years

Creating an Online Portal would simplify filing

Create a separate category for statewide networks

Eliminating miscellaneous telephone service may be more difficult than it's worth

Pay BEAR reimbursements directly to applicant

Reduce Comad Exposure over time for non-fraudulent conditions

Recommend the development of an Online Form 500 or a revision to the Form 472 that includes a check box indicating the applicant will return unused dollars to the fund upon reconciliation of the FRN, but not before 30 days after the Quarterly Disbursement Report is mailed to the applicant. Or, allow funding to automatically go back to the program if not collected 3 years after the last date to invoice.

E-mpa™

USAC should encourage state master contracts but not require them.

The E-Rate program should be updated to reflect the realities and needs of kids and schools today. The Commission correctly asked a broad set of questions and should consider all options and ideas for modernizing the E-Rate program received through the initial comment period.

Several key goals are important to this rulemaking process:

Modernization of the E-Rate program should be aligned with today's technology, focusing on high-speed bandwidth.

The rulemaking should focus on supporting next generation models such as online and blended learning.

The program should be simplified to make it easier for school districts to access E-Rate funds.

It should be updated to align with current reform efforts in education.

It should better connect to other technology efforts at the state and local level in order to leverage other efforts and build a cohesive system.

The program should increase price transparency and provide incentives to purchase bandwidth more efficiently.

Conclusion:

We appreciate the time and consideration dedicated by the Commission to these issues and welcome additional improvements to the program which will continue this critical program for schools and libraries across the nation and the students and library patrons they serve.

Submitted by:

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President

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November 8, 2013